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Attorneys for Debtors and Debtors in Possession

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

** All papers shall be filed in the Lead Case, No. 19-30088 (DM).*

Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

NOTICE OF APPEAL AND STATEMENT OF ELECTION TO HAVE APPEAL HEARD BY DISTRICT COURT IN THE EVENT UNITED STATES COURT OF APPEALS FOR THE NINTH CIRCUIT DOES NOT AUTHORIZE DIRECT APPEAL PURSUANT TO 28 U.S.C. § 158(d)

1 NOTICE IS HEREBY GIVEN that PG&E Corporation (“**PG&E Corp.**”) and
2 Pacific Gas and Electric Company (the “**Utility**”), as debtors and debtors in possession
3 (collectively, “**PG&E**” or the “**Debtors**”) in the above-captioned chapter 11 cases (the “**Chapter**
4 **11 Cases**”), hereby appeal, pursuant to 28 U.S.C. § 158(a)(1), from the *Order on Applicability of*
5 *Inverse Condemnation; Rule 54(b) Certification* entered on December 3, 2019 [Docket No. 4949]
6 (the “**Order**”) and the related *Memorandum Decision on Inverse Condemnation* entered on
7 November 27, 2019 [Docket No. 4895] (the “**Memorandum**”). Copies of the foregoing are
8 attached hereto as **Exhibit A** and **Exhibit B**, respectively.

9 The Debtors intend to file a petition for a direct appeal pursuant to 28 U.S.C.
10 § 158(d) with the United States Court of Appeals for the Ninth Circuit (the “Ninth Circuit”). As
11 set forth in the *Memorandum Regarding Certification for Direct Appeal to Court of Appeals*
12 [Docket No. 4953], the *Certification for Direct Appeal to Court of Appeals* [Docket No. 4954], the
13 *Amended Memorandum Regarding Certification for Direct Appeal to Court of Appeals* [Docket
14 No. 4965], and the *Amended Certification for Direct Appeal to Court of Appeals* [Docket No.
15 4967], all entered on December 3, 2019, this Court has certified a direct appeal of the Order to the
16 Ninth Circuit. The Debtors submit that there are bases under 28 U.S.C. § 158(d) for direct
17 certification to the Ninth Circuit. If permission to appeal is denied by the Ninth Circuit, then,
18 pursuant to 28 U.S.C. § 158(c)(1), the Debtors elect to have the appeal heard by the United States
19 District Court for the Northern District of California rather than by the Bankruptcy Appellate Panel
20 for the Ninth Circuit.

21 The names of all parties to the Order and Memorandum other than the Debtors, and
22 the names, addresses, and telephone numbers of their attorneys, are:
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Party	Counsel
Certain PG&E Shareholders*	<p>JONES DAY Bruce S. Bennett (SBN 105430) Joshua M. Mester (SBN 194783) James O. Johnston (SBN 167330) 555 South Flower Street, Fiftieth Floor Los Angeles, CA 90071.2300 Telephone: (213) 489-3939 Facsimile: (213) 243-2539 E-mail: bbennett@jonesday.com, jmester@jonesday.com, jjohnston@jonesday.com</p>
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1 2 3 4 5 6 7 8 9 10 11 12 13 14	Official Committee of Tort Claimants	<p>BAKER & HOSTETLER LLP Robert A. Julian (SBN 88469) Cecily A. Dumas (SBN 111449) 600 Montgomery Street, Suite 3100 San Francisco, CA 94111 Telephone: (415) 659-2600 Facsimile: (415) 659-2601 Email: rjulian@bakerlaw.com, cdumas@bakerlaw.com</p> <p>BAKER & HOSTETLER LLP Eric E. Sagerman (SBN 155496) Lauren T. Attard (SBN 320898) 11601 Wilshire Boulevard, Suite 1400 Los Angeles, CA 90025 Telephone: 310.820.8800 Facsimile: 310.820.8859 Email: esagerman@bakerlaw.com, lattard@bakerlaw.com</p> <p>BAKER & HOSTETLER LLP David B. Rivkin, Jr. (SBN 394446) 1050 Connecticut Ave., NW, Suite 1100 Washington, DC 20036 Telephone: 202.861.1731 Facsimile: 202.861.1783 Email: drivkin@bakerlaw.com</p>
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<p>Eighty-one individual, business, commercial, family trust and personal injury victims of the Camp Fire</p>	<p>RICHARDS LAW FIRM John T. Richards, Esq. Evan Willis, Esq. 101 West Broadway, Suite #1950 San Diego, CA 92101 john@jrtlaw1.com evan@jrtlaw1.com</p>
<p>Ad Hoc Group of Subrogation Claim Holders*</p>	<p>WILLKIE FARR & GALLAGHER LLP Matthew A. Feldman (pro hac vice) Joseph G. Minias (pro hac vice) Benjamin P. McCallen (pro hac vice) 787 Seventh Avenue New York, NY 10019-6099 Telephone: (212) 728-8000 Facsimile: (212) 728-8111 Email: mfeldman@willkie.com, jminias@willkie.com, bmccallen@willkie.com</p> <p>DIEMER & WEI LLP Kathryn S. Diemer (#133977) 100 West San Fernando Street, Suite 555 San Jose, CA 95113 Telephone: (408) 971-6270 Facsimile: (408) 971-6271 Email: kdiemer@diemerwei.com</p>
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Individual Wildfire Victims Barbara Thompson, John Thompson, Matthew Thompson, Peter Thompson, Raymond Breitenstein, and Stephen Breitenstein	<p>COREY, LUZAICH, DE GHETALDI & RIDDLE LLP Dario de Ghetaldi – Bar No. 126782 Amanda L. Riddle – Bar No. 215221 Steven M. Berki – Bar No. 245426 700 El Camino Real, P.O. Box 669 Millbrae, CA 94030-0669 Telephone: (650) 871-5666 Facsimile: (650) 871-4144 Email: deg@coreylaw.com, alr@coreylaw.com, smb@coreylaw.com</p> <p>DANKO MEREDITH Michael S. Danko – Bar No. 111359 Kristine K. Meredith – Bar No. 158243 Shawn R. Miller – Bar No. 238447 333 Twin Dolphin Drive, Suite 145 Redwood Shores, CA 94065 Telephone: (650) 453-3600 Facsimile: (650) 394-8672 Email: mdanko@dankolaw.com, kmeredith@dankolaw.com, smiller@dankolaw.com</p> <p>GIBBS LAW GROUP Eric Gibbs – Bar No. 178658 Dylan Hughes – Bar No. 209113 505 14th Street, Suite 1110 Oakland, CA 94612 Telephone: (510) 350-9700 Facsimile: (510) 350-9701 Email: ehg@classlawgroup.com, dsh@classlawgroup.com</p>
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For group parties denoted with “*”, please see **Exhibit C** hereto for a detailed list identifying members of the group.

Dated: December 17, 2019

**CRAVATH, SWAINE & MOORE LLP
WEIL, GOTSHAL & MANGES LLP
MUNGER, TOLLES & OLSON LLP
KELLER & BENVENUTTI LLP**

By: /s/Kevin J. Orsini
Kevin J. Orsini

Attorneys for Debtors and Debtors in Possession